

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

## **In re: IntraMTA Switched Access Charges Litigation**

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No. 3:14-md—2587-D

**CENTURYLINK'S EMERGENCY MOTION TO SUSPEND DEADLINES  
IN ALL ACTIONS TRANSFERRED INTO THIS MULTIDISTRICT PROCEEDING**

TO THE HONORABLE SIDNEY A. FITZWATER:

Pursuant to Rule 16 and the Court’s inherent authority to control its docket, the CenturyLink defendants (“CenturyLink”) – 77 defendants in the transferred actions that are local phone companies and also wholly-owned subsidiaries of CenturyLink, Inc.<sup>1</sup> – respectfully request that the Court stay all deadlines in all actions transferred to this Court in the above-captioned multidistrict proceeding (the “Multidistrict Proceeding”). Pursuant to Orders of the Judicial Panel on Multidistrict Litigation, this Multidistrict Proceeding will eventually consist of at least 72 actions involving three plaintiffs and over 400 defendants. Deadlines, including responses to complaints, are rapidly approaching – including one CenturyLink has on December 31, 2014. Absent an immediate stay, the parties will have to prepare, and the Court will have to review, dozens or even hundreds of mostly duplicative motions – thus negating the very reasons the Panel is transferring these actions to this Court for consolidated proceedings.

CenturyLink respectfully suggests that the Court should enter a standing order, so that additional actions transferred to this Proceeding at a later time are automatically suspended.

<sup>1</sup> The 77 CenturyLink affiliates (of which one is a plaintiff and all 77 are defendants) are listed in Exhibit A hereto.

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The grounds for this Motion for Stay are set forth in the accompanying Memorandum of Law.

Date: December 19, 2014

Respectfully submitted,

/s/ Michael P. Lynn, P.C.

Michael P. Lynn, P.C.  
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Christopher J. Akin  
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**ATTORNEYS FOR CENTURYLINK  
AFFILIATES**

**CERTIFICATE OF CONFERENCE**

CenturyLink represents that David Vogel (of the firm Cooley LLP in Reston, VA), counsel for CenturyLink, conferred with Ms. Tamerlin Godley (of the firm Munger, Tolles & Olson LLP in Los Angeles, CA), counsel for Verizon, on December 18, 2014, and was informed that Verizon supports this Motion. CenturyLink further represents that Mr. Vogel conferred with Messrs. Charles Steese (of the firm Armstrong Teasdale in Denver, CO), Philip Schenkenberg (of the firm Briggs and Morgan, P.A., in Minneapolis, MN), and Christopher Wright (of the firm Harris, Wiltshire & Grannis LLP in Washington, DC), counsels for Sprint in the actions being transferred into this Multidistrict Proceeding and/or in the proceeding before the Judicial Panel on Multidistrict Litigation, on December 18, 2014, informing them of CenturyLink's intention to file this motion on December 19, 2014 due to the approaching deadlines including one on December 31, 2014, and asking for Sprint's position. No one responded on behalf of Sprint. Due to the press of time, CenturyLink therefore has not had the opportunity to receive Sprint's position. Given the exigent nature of the matter and that there are over 400 co-defendants, none of whom have entered an appearance in this Multidistrict Proceeding yet, CenturyLink did not confer with any co-defendants other than Mr. Chris Binnig (of the firm Mayer Brown LLP in Chicago, IL), counsel for AT&T. AT&T supports this Motion.

Certified on December 19, 2014.

*/s/ Douglas P. Lobel*

Douglas P. Lobel

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on counsel of record via *ECF* on December 19, 2014.

*/s/ Michael P. Lynn*

Michael P. Lynn, P.C.

**EXHIBIT A**

**LIST OF CENTURYLINK AFFILIATES**

**Plaintiff**

CenturyLink Communications, LLC

**Defendants**

Carolina Telephone & Telegraph Company, LLC  
Central Telephone Company  
Central Telephone Company of Texas  
Central Telephone Company of Virginia  
CenturyLink Communications, LLC  
CenturyTel Midwest-Michigan, Inc.  
CenturyTel of Alabama, LLC  
CenturyTel of Arkansas, Inc.  
CenturyTel of Central Arkansas, LLC  
CenturyTel of Central Louisiana, LLC  
CenturyTel of Central Wisconsin, LLC  
CenturyTel of Chester, Inc.  
CenturyTel of Claiborne, Inc.  
CenturyTel of Cowiche, Inc.  
CenturyTel of Eagle, Inc.  
CenturyTel of Eastern Oregon, Inc.  
CenturyTel of Evangeline, LLC  
CenturyTel of Fairwater-Brandon-Alto, LLC  
CenturyTel of Forestville, LLC  
CenturyTel of Idaho, Inc.  
CenturyTel of Inter-Island, Inc.  
CenturyTel of Lake Dallas, Inc.  
CenturyTel of Larsen-Readfield, LLC  
CenturyTel of Michigan, Inc.  
CenturyTel of Minnesota, Inc.  
CenturyTel of Missouri, LLC  
CenturyTel of Missouri, LLC (Belle-Herman)  
CenturyTel of Missouri, LLC (Central)  
CenturyTel of Missouri, LLC (Southern)  
CenturyTel of Missouri, LLC (Southwest)  
CenturyTel of Monroe County, LLC  
CenturyTel of Montana, Inc.  
CenturyTel of Mountain Home, Inc.  
CenturyTel of North Louisiana, LLC

CenturyTel of North Mississippi, Inc.  
CenturyTel of Northern Michigan, Inc.  
CenturyTel of Northern Wisconsin, LLC  
CenturyTel of Northwest Arkansas, LLC  
CenturyTel of Northwest Louisiana, Inc.  
CenturyTel of Northwest Wisconsin, LLC  
CenturyTel of Ohio, Inc.  
CenturyTel of Ooltewah-Collegedale, Inc.  
CenturyTel of Oregon, Inc.  
CenturyTel of Port Aransas, Inc.  
CenturyTel of Postville, Inc.  
CenturyTel of San Marcos, Inc.  
CenturyTel of Southeast Louisiana, LLC  
CenturyTel of Southern Wisconsin, LLC  
CenturyTel of Southwest Louisiana, LLC  
CenturyTel of the Gem State, Inc.  
CenturyTel of the Midwest-Kendall, LLC  
CenturyTel of the Midwest-Wisconsin, LLC  
CenturyTel of the Southwest, Inc.  
CenturyTel of Upper Michigan, Inc.  
CenturyTel of Washington, Inc.  
CenturyTel of Wisconsin, LLC  
Coastal Utilities, Inc.  
Embarq Florida, Inc.  
Embarq Minnesota, Inc.  
Embarq Missouri, Inc.  
Gallatin River Communications, LLC  
Gulf Telephone Company  
Mebtel, Inc.  
Qwest Corporation  
Spectra Communications Group, LLC  
Telephone USA of Wisconsin, LLC  
The United Telephone Company of Pennsylvania LLC  
United Telephone Company of Eastern Kansas  
United Telephone Company of Indiana, Inc.  
United Telephone Company of Kansas  
United Telephone Company of New Jersey, Inc.  
United Telephone Company of Ohio  
United Telephone Company of Texas, Inc.  
United Telephone Company of the Carolinas LLC  
United Telephone Company of the Northwest  
United Telephone Company of the West  
United Telephone Southeast LLC

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**Page 6**